

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT NEW YORK

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BRUCE HAY, : Case No. 1:20-cv-6135-JPO  
Plaintiff, :  
: - against -  
: NEW YORK MEDIA LLC and KERA  
: BOLONIK,  
: Defendant. :  
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**DECLARATION OF KATHERINE M. BOLGER IN SUPPORT OF DEFENDANTS'  
OPPOSITION TO PLAINTIFF'S MOTION FOR LEAVE TO FILE SECOND  
AMENDED COMPLAINT**

KATHERINE M. BOLGER declares as follows under the penalty of perjury pursuant to 28 U.S.C. § 1746:

1. I am a partner at the law firm of Davis Wright Tremaine LLP, counsel for defendants New York Media, LLC and Kera Bolonik ("Defendants").
2. I submit this affirmation in support of Defendants' Opposition to Plaintiff's Motion for Leave to File Second Amended Complaint. I have personal knowledge of the facts herein.
3. Attached hereto as **Exhibit 1** is a true and correct copy of a letter sent by email to Plaintiff's counsel in this action on November 20, 2020.

Dated: New York, New York  
January 22, 2021



Katherine M. Bolger